

**Wyckoff Eagle Harbor Superfund Site – OUs 2 and 4
SSC Ecology – EPA Quarterly Coordination Meeting
6/14/17
FINAL Meeting Summary**

MEETING ATTENDEES

Michael Szerlog, EPA	Sandra Caldwell, Ecology
Helen Bottcher, EPA	Hun Seak Park, Ecology
Bonnie Arthur, EPA	Sam Meng, Ecology
Deb Sherbina, EPA	Susannah Edwards, Ecology
	Dawn Hooper, Ecology
	Kate Snider, Floyd Snider

This meeting summary was prepared by Kate Snider and reviewed by all attendees. It is not a full record of the discussion, but a record of key discussion points and action items.

MEETING AGENDA

This meeting was the twenty-fourth quarterly coordination meeting held since the execution of the 2012 Superfund State Contract between USEPA and the state of Washington relating to remedial action and operations and maintenance at the Soil and Groundwater Operable Units (OUs 2 and 4) of the Wyckoff Eagle Harbor Superfund Site, Bainbridge Island, WA.

Appendix B of the Superfund State Contract is the “EPA/Ecology Site-Specific Statement of Work for Groundwater Treatment Plant Operations and Maintenance and Focused Feasibility Study Related to Permanent Mass Removal” (SOW). In accordance with the SOW, each quarterly meeting will address two goals:

- 1) Review progress on both Ecology and EPA Tasks defined in the SOW.
- 2) Discuss major schedule adjustment. The SOW states “If delays of more than one month are anticipated for any element [of the Focused Feasibility Study and Proposed Plan], project managers will elevate the matter to their immediate supervisors for discussion.

The meeting agenda included:

1. Progress Review – Ecology O&M Tasks
 - Operational status
 - Maintenance and repairs
 - Free product collection and disposal
 - Status of CH2MH contract extension
 - Operations plan during potential state-operations shutdown
 - Ecology operations during 2017-2019, funding status
 - Proposed Fact Sheet – Public Notice re shutdown
 - Lower aquifer monitoring strategy
2. Progress review – EPA tasks, status, schedule review

- Staffing Update
 - Status FFS/Proposed Plan update and Response to Comments
 - Status Draft Interim ROD and Priority Panel approach
 - Updated schedule
 - Human health cleanup level for sediments
 - Status OU2/4 Sheetpile Wall Replacement and Interim Measures
 - Project funding request
 - Ecology-EPA O&M role transition during construction
 - OU1 Subtidal Cap
 - Status of Repair, Construction Completion Report
 - Plan to transition to Ecology O&M role
 - Status 5-year review
3. SSCs
- SSC Amendment (due June 30, 2017)
 - Draft comprehensive SSC with highlighted issues
4. Future Meetings

PROGRESS REVIEW – ECOLOGY O&M TASKS

- Operational status
 - Operations have been smooth, working well, effluent meeting discharge limits, hydraulic containment in place.
 - Plant operations have just been shut down this week (pumping halted) for summer maintenance period. This is approximately 2-weeks earlier than usual. Carbon will be backwashed and cleaned.
 - Ecology has recently implemented significant maintenance and repairs – approx.. \$100,000 of expenditures. Has included electrical, software, fence, pipe coatings and more. Trailer rental has been pre-paid.
 - Free product collection and disposal has been recently completed. Ecology has transported more than 3,000 gal of product to Utah for incineration.
 - CH2M Hill contract extension is currently under review, expect amendment before 6/30.
 - Standard operation, maintenance and repairs is an expenditure of approximately \$860,000 per year.
- Operations plan during potential state-operations shutdown
 - Because the legislature has not yet passed a budget for the 2017-19 biennium, Ecology is preparing for a potential state government shut-down which would start

- July 1. If a budget is not in place by July 1, staff will be furloughed, and all project expenditures stop.
- By June 15, notice will be provided to contractors and staff of potential July 1 shutdown.
- For the Wyckoff GETS system, the system will be thoughtfully shut down and cleaned between June 15 and July 1, prior to the potential shutdown. Contractors will be on site through June 30.
- Before June 30, Sam, Bonnie and Hun Seak will receive training from CH2M Hill for basic operations during shutdown.
- Ecology operations during 2017-2019, funding status
 - When there is a state budget, it may not include funding for Wyckoff. Currently there is no Wyckoff budget in the house/senate budget, although there is in the Governor's budget.
 - If a budget is passed without Wyckoff funding, Ecology will go through a process of evaluating potential alternative funding sources, and make a plan for 2017. The plan may need to include full GETS shutdown, with minimum maintenance expenditures. Hun Seak estimates that even if the plant is not operating and CH is not working, there are still approximately \$2,000/mo of required expenses.
- Proposed Fact Sheet – Public Notice re shutdown
 - EPA has prepared a draft fact sheet and talking points regarding the potential shutdown.
 - ***Dawn will schedule a conference call to be held next week, including Helen, Debra, and Ecology, to discuss the proposed approach for finalization and release of a fact sheet.***
 - ***Deb will send EPA talking points to Dawn.***
 - Ecology recommends waiting to release the fact sheet until the end of the month, when the budgetary system becomes more clear. Dawn commented that Ecology may have many other un-funded projects, and consistency of public notifications across the program is an issue.
 - Both EPA and Ecology agree that public notification, no surprises, and transparency is essential.
 - EPA recommends that the fact sheet be issued by Ecology. Both EPA and Ecology logos could be considered. Hun Seak commented that an SSC amendment should be in place prior to issuance (see discussion at the end of these notes).
- Lower aquifer monitoring strategy
 - 2016 Lower Aquifer Monitoring report by CH2M Hill was stalled due to contracting issues between EPA and CH. The CH contract is now in place, and the report should be issued soon.
 - EPA's budget includes funding for two more rounds of lower aquifer monitoring between now and 2019, and one more round of upper aquifer monitoring.

- *It was decided that we would include the timing of lower aquifer monitoring as an agenda item to be discussed at the Sept 2017 quarterly meeting.*

PROGRESS REVIEW – EPA TASKS

- Staffing Update
 - Most members of the Wyckoff team have temporarily moved into more senior positions on a 120-day detail, and will move back into previous positions at the end of that time:
 - Michael is temporarily in Cami's position
 - Helen is temporarily in Beth's position through mid-September, and then will be back in RPM role.
 - Bonnie has stepped in to assist Helen as RPM until Helen transitions back. Bonnie is focusing on brush clearing and electrical repair, and other tasks as needed.
 - Helen is keeping responsibility for the ROD amendment.
 - Helen is currently looking for additional help to PM the replacement wall design process.
- Status Draft Interim ROD, FFS/Proposed Plan update, Response to Comments, Priority Panel, Schedule:
 - Interim ROD Amendment is focus – Helen is working on that language
 - Anticipated schedule – likely Interim ROD signed by EPA in January 2018.
 - Anticipate Interim ROD to Ecology in early December for Concurrence. Will provide ARAR table and language re sediment cleanup standards earlier (see discussion below).
 - Potential process change due to EPA Administrator revoking delegation – new Administrator must sign any ROD with value greater than \$50M, but process is unclear.
 - Early July, meeting with Region 10 Cleanup Program Lead to discuss packaging of the Wyckoff project, and schedule for approval. May consider separating OU1 and Wall from OU 2/4.
 - FFS completion and Response to Comments – working with CH2M Hill.
 - Priority Panel is needed for construction funding – likely go before Priority Panel in November for construction funding for wall replacement. Other work would not go to Priority Panel until 2018 or later.
 - May not need ROD Amendment for wall replacement, as wall is already a part of EPAs responsibility under current ROD – but design for wall replacement would need to be coordinated closely with other design criteria for OU 1, 2/4.
- Human health cleanup level for sediments
 - Need to revise based on new IRIS risk numbers for Benzo(a)pyrene.

- Interim ROD and response to comments will still focus on tissue-based cleanup level. EPA conclusion that this EPA cleanup level is more direct and more stringent than the SMS sediment concentration.
 - Helen stated that EPA is OK with using a market-basket approach that evaluates tissue levels in multiple clam species including those that ingest sediments. Stated that the clam species that is known to ingest sediments is not present throughout Wyckoff beach area due to grain size of beach substrates.
 - Susannah reported that based on her discussions within Ecology, she believes this approach will be acceptable, given that this is an Interim ROD. In theory, when the target tissue concentration is met, a sediment concentration protective of Tribal consumers will also be met. Ecology encourages EPA to select organisms that directly ingest sediment, to the extent possible at the Site, for assessing whether the RG for the Interim ROD has been met. Ecology's expectation is that a sediment concentration protective of Tribal consumers of fish and shellfish (which could be natural background concentrations) will be specified in the final ROD, and would be met before the State assumes responsibility of long-term O&M for the OU1 intertidal areas.
- Status OU2/4 Sheetpile Wall Replacement and Interim Measures
 - Design funding has been approved for replacement wall. Army Corps is leading the design.
 - CH2M Hill has measured wall thickness above the mudline, have good set of data, corrosion rate seems to not be accelerating as rapidly as feared. Data report will be available soon.
- OU1 Subtidal Cap
 - Repair is complete - Construction Completion Report should be received soon. Bonnie is tracking.
 - Invoice for construction share has been sent to Ecology – ***Hun Seak will check with Barry that it has been received.***
 - Helen proposes that at some point after the Interim ROD is issued, EPA will divide off the subtidal sediments for transition to Ecology for O&M. EPA will retain all intertidal sediments until OU1 remedy is complete.
 - ROD Amendment should clarify definition of “intertidal” and define that boundary. ***Susannah will research “intertidal” definition and get to Helen.***
 - ***Susannah and Hun Seak will work on an Ecology OMMP for subtidal sediments – target date of Spring 2018.***
- Status 5-year review
 - 5-Year review is underway. It is being written relative to the existing ROD.
 - Currently in review at Army Corps
 - Expected to come to Ecology for review approximately July 20, for approximately 1.5 week review

- Will be finalized by EPA by the end of September.

SSCS

- SSC Amendment (due June 30, 2017)
 - Will be identical to previous SSC amendments, with adjusted dates.
 - **Helen will transmit to Ecology within the next week for review and signature**
- Comprehensive Future SSC
 - Needs to be discussed at the September 6 meeting. Needs to be negotiated by June 2018.

FUTURE MEETINGS

- The next quarterly meeting is scheduled for September 6, with Jim and Cami. **Helen will work with Cami and Beth to confirm their attendance** (regardless of the status of their position details).
- **Proposed agenda items for the Sept 6 meeting include:**
 - Status of GETS operations – potential long term shutdown
 - Schedule for lower aquifer monitoring given GETS status
 - Interim ROD Amendment – Structure, packaging, schedule and process for EPA approval
 - Comprehensive future SSC
- **Kate will schedule quarterly meetings for:**
 - Mid December (without Jim and Cami)
 - March 2018 (with Jim and Cami)
 - June 2018 (without Jim and Cami)